
**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION

No. 12-md-2323 - AB

MDL No. 2323

**Motion to Remand Against Riddell
Defendants**
DeLeone
v. National Football League [et al.],
No. 2:13-cv-04230-AB

MOTION TO REMAND

**IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION**

JURY TRIAL DEMANDED

MOTION TO REMAND

Plaintiff, MALINDA K. DELEONE, Personal Representative for the Estate of THOMAS D. DELEONE, moves this Court for the entry of an Order, pursuant to 28 U.S.C. §1447(c), remanding this case to the Circuit Court of Cook County. In support Plaintiff states:

1. On June 3, 2013, Plaintiff filed this action in the Circuit Court of Cook County, Illinois.
2. Plaintiff moves to Remand, as DeLeone's claims against the NFL have been settled and dismissed.
3. Since resolution of Plaintiff's pending claims against Riddell do not require interpretation of any NFL/NFLPA Collective Bargaining Agreement ("CBA") his claims are not preempted and no federal question jurisdiction exists.

WHEREFORE, Plaintiff respectfully requests this Court enter an order, pursuant to 28 U.S.C. §1447(c), granting Plaintiff's Motion to Remand this case to the Circuit Court of Cook County, Illinois.

Respectfully submitted,

/s/ William T. Gibbs

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CERTIFICATE OF SERVICE

On December 4, 2017, I electronically filed a copy of the foregoing document through the CM/ECF system for the United States District Court for the Eastern District of Pennsylvania, which will send a notice of electronic filing to all counsel of record and make it available for viewing and downloading from the CM/ECF system.

Respectfully submitted,

/s/ William T. Gibbs

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